

Lincoln Combs
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June 28, 2018

SENT VIA CERTIFIED MAIL

Re: *Doris Jones v. C.R. Bard, Inc., et al.* Jury Trial, May 15-June 1, 2018

Dear Mr./Ms. _____:

On behalf of Plaintiff Doris Jones, as her lawyers we write to you to ask if you are willing to speak with us about your experience and assessment of the recent trial. Judge Campbell has granted permission for us to send you this letter and we are happy to compensate you for your time, but you are under no obligation to respond to this letter or talk to us if you do not wish to. We are just trying to learn what you and the other jurors thought about the case for future trials.

Judge Campbell has authorized us to discuss with you your answers to the following questions:

1. After the jury was initially deadlocked, what facts or arguments changed the vote of those jurors who had previously favored Plaintiff?
2. What was the most important fact or facts that lead you to conclude that the Eclipse was not defectively designed?
3. Are there other facts about the design of the Eclipse that you would have wanted to know?
4. Would your opinion about the nature of the Eclipse's design have been different if Mrs. Jones had died from the filter fragment?
5. Did you believe that Mrs. Jones suffered actual harm?
6. Had you found the Eclipse filter defective, would you have been inclined to award damages for future harm to her? If so, what amount? Were any amounts for damages ever discussed?
7. Did you or any other juror express that punitive damages were appropriate in this case?
8. Was FDA evidence important to you?
9. Did you feel a decision by the FDA was dispositive and could not be questioned by you?
10. Did you feel the Society for Interventional Radiology Guidelines applied to a medical device company?
11. Did you feel the SIR Guidelines provided acceptable thresholds for IVC filter failure rates?

If you would like to speak with us please contact me at the number or e-mail address above or call my assistant Kelly Saltsman at 602-530-8356 and we will make arrangements.

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On behalf of Doris's entire trial team, thank you for all your work as a juror and for spending three weeks away from your families and jobs to help us decide our case. We hope to hear from you soon.

Very truly yours,

GALLAGHER & KENNEDY, P.A.

By

Lincoln Combs
Mark S. O'Connor
Paul L. Stoller
Shannon L. Clark

LC:kas

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